

**District Court of the United States
Southern District of New York**

John Barth,
 Plaintiff
 v.
Houghton Mifflin Co., et al,
 Defendants

Case No. 1:25-cv-01777

**LETTER MOTION OF PLAINTIFF
TO PRESERVE SEAL OR REDACT IDENTITY**

The Plaintiff first thanks the court for clarifying in its 6/25/25 order [87] the details that may be redacted from unsealed documents. The Court's prior order on redaction 6/12/25 led the Plaintiff to file on 6/22/25 more strongly redacted versions of prior filings [76, 78, 79, 80, 81, 82, 83, 84]. However, redaction of Plaintiff identity or preservation of seal is valid, and the Plaintiff hereby moves for such an order, and to remove the lightly-redacted filings from the docket.

The Plaintiff has fully argued in his 5/25/25 *Motion To Preserve Seal* emailed to the parties and judge, and now ECF filed herewith, that the nature of this case does not permit sufficient redaction to prevent extensive damages caused by public access, so that it should remain under seal. Certainly, in cases of libel *per se*, the identity of a *private* Plaintiff is not a fact that facilitates judicial oversight requiring public disclosure, as claimed in the 6/25/25 order forcing the Plaintiff to include his identity in redacted documents. The Court argument that *revealing the identity of a private Plaintiff* somehow facilitates judicial oversight requiring public disclosure, is *not applicable* to libel *per se* against *private* plaintiffs.

These orders therefore subject the Plaintiff to unjustified re-publication of the libel of intrafamilial conflict, even where specific libels are redacted, enabling opponents of public-interest activities of the Plaintiff, and others, to abuse that information to defame the Plaintiff. If the court does not modify that order, it will greatly extend the libel damages without cause, a deliberate injury (which also creates liability of the United States for resulting damages). The Plaintiff hereby moves that the Court prevent that injury, by preserving seal of the case, or allowing redaction of information concerning the Plaintiff identity.

Respectfully Submitted,
John Barth, Plaintiff

OATH AND CERTIFICATE

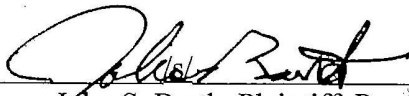
I the Plaintiff John Barth do hereby certify under penalty of perjury that the facts stated in this document are true to the best of my knowledge and belief, and that a true copy of this document shall be served by first class mail upon the defendants or their representatives at their address of record as follows:

Steven Glen Mintz
and Terence William McCormick
Mintz & Gold LLP
600 Third Avenue, 25th Flr
New York, NY 10016

Representing:

Harper Collins Publishers
News Corp
Houghton Mifflin
John S. Barth (sr.) (deceased 4/2/2024)
Estate of John Barth (sr.)
Shelly R Barth
Shelly R Barth Revocable Trust

Date 7/05/2025



John S. Barth, Plaintiff, Pro Se
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